

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE VIVENDI UNIVERSAL, S.A.)
SECURITIES LITIGATION)
)
)
)
) No. 02 Civ. 5571 (RJH)

ALEXANDER REUS hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member of Diaz Reus & Targ LLP (f/k/a Diaz Reus Rolff & Targ LLP) (“DRRT”), co-counsel for certain of the Individual Plaintiffs in this matter. I make this declaration in opposition to the Class Plaintiffs’ “Motion Regarding Misleading Mass Mailing Sent to French Class Members by Certain Counsel for the Individual Plaintiffs.”

2. Class Plaintiffs complain that I made a “mass mailing” to French investors, alerting them that defendants had filed a motion to exclude them from the class. There was no “mass mailing.” I sent such letters to only ten French investors.

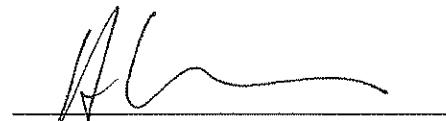
3. All of the recipients of the letters were institutions with whom my firm had previously had a relationship or had communicated, either in connection with other cases, or in connection with conferences relevant to the interests of institutional investors, or otherwise.

4. Mr. Saunders suggests in his declaration that I might have used information produced by Vivendi in this action to ascertain the identity of French members of the class. This is absolutely not so. I am not aware of any information being produced in this case showing the identities of class members, and, in any event, I did not use any such information in sending these letters. As stated above, I was familiar with the recipients of the letters from prior dealings and communications, and I assumed that as large institutional investors they would have had a

position in Vivendi securities. My letters asked the investors for trading records because without that I could not determine if they were members of the Class or not.

5. I have agreed not to send any further letters like this pending the Court's decision on defendants' motion to exclude French investors from the class, and class counsel was informed of this before they filed their motion.

Done this 17th day of June, 2008.



Alexander Reus (AR-4674)